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A F F I D A V I T

STATE OF WEST VIRGINIA

COUNTY OF KANAWHA, to-wit:

I, Eric Seth Johnson, being duly sworn, hereby depose and state as follows:

1. I am a Task Force Officer (TFO) with the United States Postal Inspection Service (USPIS) since September 2022. I am presently assigned to the USPIS Charleston, WV domicile, where my responsibilities include the investigation of crimes involving the United States Postal Service (USPS), specifically the investigation of narcotics proceeds and/or controlled substances sent through the U.S. Mail. I have completed the required training by the USPIS relating to my responsibilities as a TFO. In addition to my assignment with USPIS, I am also a Detective with the Metropolitan Drug Enforcement Network Team (MDENT) assigned from the Charleston Police Department where I have been employed since April of 2015. I have been assigned to MDENT since December of 2018. Within this capacity, I have conducted and been part of numerous mid to high level drug investigations and assisted USPIS with various parcel related narcotics investigations. Additionally, I am a canine handler with a certified narcotics canine, Rex. Prior to my employment with the Charleston Police Department, I worked as an Officer with the Ripley Police

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Department after obtaining my law enforcement certification through the West Virginia State Police Academy in 2013.

2. This affidavit is made in support of an application for a search warrant to search the contents of USPS Priority Mail Package bearing tracking number "9505 5066 5106 2298 0427 88" with a return address of "JASON MAYOR 1585 E GRANT RD TUCSON AZ 85719-3313" and a delivery address of "JESSIE CANTERBURY 1445 WASHINGTON ST W CHARLESTON WV 25387-2327" (hereinafter referred to as "SUBJECT PARCEL"). The SUBJECT PARCEL is a Priority Mail large flat rate box. The SUBJECT PARCEL was mailed on October 25, 2022, from Phoenix, AZ 85013 with \$22.45 postage affixed. The SUBJECT PARCEL is currently located at 1000 Centre Way, Charleston, WV 25309.

3. The information contained in this affidavit is based on information I have gained from my investigation, my personal observations, my training and experience, and information related to me by other law enforcement agents and witnesses.

4. Drug trafficking background gained over the years has shown that drug dealers and drug traffickers utilize the USPS for shipping narcotics proceeds and controlled substances, including but not limited to cocaine, heroin, methamphetamine, marijuana, and pharmaceuticals. The use of Express Mail, Priority Mail and First-Class Mail are favored because of the reliability, anonymity, speed (overnight service), minimal cost, and ability to track the mail piece.

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5. Through experience gained in drug investigations by Postal Inspectors and other law enforcement agents, and through information provided by individuals who have been involved in buying, selling, and shipping drugs by Express Mail, Priority Mail, and other types of shipments, the USPIIS has established a drug profile policy to screen mail packages for narcotics and/or controlled substances. The profile characteristics include peculiarities in labeling and unusual packaging techniques as well as other considerations. The reason that handwritten labels are of interest is that the vast majority of premium mail services such as Express and Priority Mail involves business-to-business or business-to-person correspondence and features typewritten or computer-generated labels. Person-to-person correspondence (and the handwritten labels attendant thereto) accounts for a very small minority of total Express and Priority Mail traffic.

6. Postal Inspectors, Special Agents of the Drug Enforcement Administration (DEA) and other intelligence sources have identified Arizona, Oregon, California, Florida, Georgia, Michigan, New Jersey, New York and Texas as major source states for illegal drugs flowing into areas within the Southern District of West Virginia.

7. From my experience, training, and knowledge of drug shipments through the U.S. Mail, I am aware that drug traffickers frequently use fictitious names and addresses on the return address

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portion of the mailing label both to remain anonymous and avoid detection. Some return addresses have been found to be legitimate addresses, but the actual resident at those locations is either fictitious or non-existent. I am also aware that the address of the person that the mail piece is addressed to is generally not fictitious because a valid address is necessary for the package to be delivered. However, at times the true name of the addressee may be altered or ignored in favor of an alias or code name to better disguise their identity from law enforcement.

8. Based upon my knowledge, training, and experience, I know that drug traffickers using the USPS often use unusual packaging techniques. These may include excessive taping or wrapping or by including within the package items having strong odors in an effort to contain or mask the odor of controlled substances in order to avoid detection by trained narcotics dogs.

9. Your affiant knows based on training and experience, as well as consultation with other agents, that U.S. Mail is often used by narcotic traffickers to transport controlled substances, as well as U.S. currency derived from the distribution of controlled substances, either as payment or proceeds. Your affiant knows based on training and experience that USPS Express and Priority Mail are commonly used to transport controlled substances because narcotic traffickers can track the parcels, and control dispatch times and locations.

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BACKGROUND OF INVESTIGATION

10. On October 27, 2022, while reviewing USPS electronic records Postal Inspector Holestine identified a parcel originating in a known source state, Arizona, that was destined to the Southern District of West Virginia. The parcel was identified as USPS Priority Mail Package bearing tracking number "9505 5066 5106 2298 0427 88" with a return address of "JASON MAYOR 1585 E GRANT RD TUCSON AZ 85719-3313" and a delivery address of "JESSIE CANTERBURY 1445 WASHINGTON ST W CHARLESTON WV 25387-2327" (SUBJECT PARCEL).

11. On October 29, 2022, Postal Inspector Holestine identified the parcel had arrived at the Charleston, WV Processing and Distribution Center (PDC). On the same date, Postal Inspector Holestine went to the Charleston, WV PDC and noted, among other characteristics, that the SUBJECT PARCEL bore a computer-generated label, fictitious name and address information, and was mailed from Arizona, a known source state for narcotics.

12. While handwritten labels are a consistent part of a known drug profile to screen mail packages for narcotics proceeds and/or controlled substances, in October 2022, the USPS implemented a new process in which parcels mailed at self-service kiosks (SSK) require a computer-generated label with name and address information. The mailer must provide both return and delivery name and address information to the USPS SSK at the retail location. A

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label is then created, affixed to the mail piece, and introduced into the US Mail Stream. The information provided by the customer may still be fictitious and/or incomplete which is also a consistent part of the known drug profile to screen mail packages for narcotics proceeds and/or controlled substances.

13. On October 31, 2022, your affiant made inquiries with CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information, regarding the return address of "JASON MAYOR 1585 E GRANT RD TUCSON AZ 85719-3313". CLEAR showed this name did not associate at that address. Your affiant also conducted a search regarding the delivery address of "JESSIE CANTERBURY 1445 WASHINGTON ST W CHARLESTON WV 25387-2327". CLEAR showed this name did not associate at that address.

14. On October 31, 2022, your affiant provided his trained narcotic detection dog, "Rex". Rex has experience with narcotics investigations including drug parcels and was last certified in April of 2022. The SUBJECT PARCEL was placed in a line-up with four (4) additional boxes of similar shapes and sizes. Rex conducted an exterior examination of all the parcels. Rex positively alerted on the SUBJECT PARCEL indicating the presence of the odor of controlled substances.

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15. Based on the information contained herein, your affiant maintains there is probable cause to believe that the SUBJECT PARCEL - USPS Priority Mail Package bearing tracking number "9505 5066 5106 2298 0427 88" - contains controlled substances, and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1), 843(b) and 846.

Further your affiant sayeth naught.



Eric Seth Johnson
USPIS Task Force Officer

On the 31ST Day of October 2022, this affidavit was sworn to by the affiant, who did no more than attest to its contents pursuant to Crim. R. 4.1 (b)(2)(A), by telephone after a document was transmitted by email, per Crim. R. 4.1.



DWANE L. TINSLEY
UNITED STATES MAGISTRATE JUDGE